

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: Vicky Rodríguez-Torres
Debtor

09-10864-BKT7
Chapter 7

ADDENDUM TO STATEMENT OF FINANCIAL AFFAIRS (OFFICIAL FORM NO. B7)

TO THE HONORABLE COURT:

Debtor Vicky Rodríguez-Torres, by and through her undersigned counsel, states as follows:

1. Debtor filed the current petition on December 19th, 2009.
2. At the time the current petition was filed, Debtor had filed an employment cause of action against former employer Government Development Bank for Puerto Rico (**GDB**) on February 17th, 2009, in the US District Court, case number 09-1151-JP.
3. Additionally, at the time the current petition was filed, Debtor had filed a second employment cause of action against the same former employer, **GDB**, on November 25th, 2009, in the US District Court, case number 09-2199-FAB. This second cause of action was derivative of the first, 09-1151-JP, inasmuch Debtor alleged GDB had unlawfully retaliated against her, for bringing the same. Further, Debtor had filed an administrative proceeding internally within GDB,

challenging her dismissal from employment, on or around November, 2009.

4. Summary judgment was granted in favor of GDB in case 09-1151-JP, and Debtor has appealed to the 1st Circuit Court of Appeals in case 10-1441. Debtor has also brought other final judgment and interlocutory appeals and proceedings before the 1st Circuit Court of Appeals, all originating from case 09-1151-JP.
5. Through no fault of Debtor, the undersigned valued all of the claims in *Schedule B—Personal Property*, at \$30,000.00, while specifically disclosing only the originating cause of action, 09-1151-JP in the *Statement of Financial Affairs*. None of the failures or omissions were caused or contributed to by Debtor.
6. The above valuation and disclosure were based on the following determination, made solely by and through the undersigned's judgment:
 - a. all actions were originated and stemmed from the disclosed case, 09-1151-JP;
 - b. Debtor had received a settlement offer of \$30,000.00 in case 09-1151-JP from GDB (See: Exhibit 1);
 - c. the almost certain likelihood that any settlement would only be reached if it included all causes of action against GDB, known or unknown, which would therefore include case 09-2199-FAB, and the aforementioned administrative proceeding.

7. In any event, all of the above causes of action were brought to the attention of Trustee, as laid out in **Doc.# 62**. The disclosure of the above causes of action and their valuation, appeared to have been made to Trustee's satisfaction.

8. GDB, as a creditor in the current petition, has taken exception to the above valuation and disclosure (See: Doc.# 52), and Debtor hereby accordingly supplements her original *Statement of Financial Affairs, Question 4: Suits and administrative proceedings, executions, garnishments and attachments* with the following contingent causes of action:

CAPTION OF SUIT AND CASE NUMBER	NATURE OF PROCEEDING	COURT OF AGENCY AND LOCATION	STATUS OR DISPOSITION
a. Rodríguez, et. al. v. GDB 09-1151-JP	Employment Discrimination complaint	USDC-PR	Pending Appeal.
b. Rodríguez, et. al. v. GDB 09-2199-FAB	Retaliation complaint	USDC-PR	Active.
c. Rodríguez, et. al. v. GDB 09-2442	Interlocutory appeal	1st Cir.	Dismissed.
d. Rodríguez, et. al. v. GDB 10-1065	Mandamus	1st Cir.	Dismissed.
e. Rodríguez, et. al. v. GDB 10-1441	Judgement appeal	1st Cir.	Active.
f. Rodríguez, et. al. v. GDB 10-1709	Judgement appeal	1st Cir.	Active.
g. Rodríguez, et. al. v. GDB 10-1713	Judgement appeal	1st Cir.	Active.
h. Rodríguez, et. al. v. GDB	GDB Administrative Proceeding	1st Cir.	Active.
i. Rodríguez, et. al. v. GDB 09-bk-10864-7	Adversary Proceeding	USBC-PR	To be filed.

9. On this same date, Debtor is amending both, *Schedule B—Personal Property*, and *Schedule F—Creditors holding unsecured nonpriority claims*, to reflect any contingent personal property or liabilities which existed at the time this current petition was filed, but which were unknown or otherwise undisclosed, as explained above.

WHEREFORE, for all of the above, Debtor prays that this Honorable Court:

TAKE NOTICE all of the above.

Respectfully submitted in New York, New York, 2nd day of August, 2010.

S/William Meléndez-Menéndez

William Meléndez-Menéndez
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of August, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties in interest.

In New York, New York, this 2nd day of August, 2010.

S/William Meléndez-Menéndez

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